

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UNITED STATES, *et al.*,

No. 1:23-cv-00108-LMB-JFA

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

**UNOPPOSED MOTION OF NON-PARTY NEWS CORP
TO MAINTAIN CERTAIN PERSONAL INFORMATION UNDER SEAL**

News Corp submits this motion in response to the Court's Order (Dkt. No. 441), which directed Google to file an unredacted public version of Exhibit 12 attached to Google's Opposition to the United States' Motion for Partial Judgment on the Pleadings. Since the Court issued its Order on sealing, News Corp and Google have been conferring over News Corp's request that, rather than filing the full Exhibit 12 publicly, Google file a version that redacts only the name and email address of a current News Corp employee: the second of the two News Corp employees listed on slide 62 of the exhibit (Bates stamped NEWSCORP-DOJCID-00003619). News Corp therefore respectfully requests that the Court permit Google to file a version of Exhibit 12 containing those redactions.

Google and the United States do not oppose the relief that News Corp seeks in this motion.

Consistent with the approach taken by Judge Castel in the MDL proceedings,¹ this Court has previously allowed similar personal information to remain under seal.² The same privacy considerations support the limited redaction here.

Dated: September 20, 2023

Respectfully submitted,

/s/ Charles B. Molster

Charles B. Molster, III (Va. Bar No. 23613)
Law Offices of Charles B. Molster, III PLLC
2141 Wisconsin Avenue
Suite M
Washington, D.C. 20007
Office: (202) 787-1312
Cell: (703) 346-1505
Email: cmolster@molsterlaw.com

John Thorne*
Daniel G. Bird*
KELLOGG, HANSEN, TODD, FIGEL
& FREDERICK, P.L.L.C.
1615 M Street NW
Suite 400
Washington, DC 20036
Tel.: (202) 326-7900
Fax: (202) 326-7999
Email: jthorne@kellogghansen.com
dbird@kellogghansen.com

* Admitted *Pro Hac Vice*

Counsel for News Corporation

¹ See, e.g., Order, *In re Google Dig. Advert. Antitrust Litig.*, No. 1:21-md-03010 (S.D.N.Y. Jan. 12, 2022), ECF No. 194 (permitting limited sealing of *Texas v. Google* complaint, finding “privacy interests implicated in the names, job titles and contact information of certain Google employees outweighs the presumption of public access”).

² See, e.g., Dkt. Nos. 58 (permitting limiting sealing of declaration in support of motion to transfer venue, allowing names of defendant’s employees to remain under seal), 285 (same as to personal information of defendant’s employees), 286 (same as to personal information of defendant’s employees), 362 (same as to email addresses and telephone numbers of non-DOJ employees).